



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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May 20, 1994

Secretary
U.S. Nuclear Regulatory Commission
Att: Docketing and Service Branch
Washington, DC 20555

Attached is Consumers Power Company's comments on the proposed rule to 10 CFR Part 34, "Licenses for Radiography and Radiation Safety Requirements for Radiographic Operations."

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COMMENTS ON 10 CFR PART 34
Licenses for Radiography and Radiation
Safety Requirements for Radiographic Operations

The following comments are related to the proposed amendments:

- (1) Part 34.13 - Specific license for radiography. The proposed amendment includes a requisite of certifying radiographic personnel 2 years after the final rule is published only by a certifying entity.

Discussion - The licensee with a proven and reliable certification program should be allowed to continue to certify their personnel. The method is more effective because the licensee uses procedures, materials and related equipment applicable to their specific operations, rather than in general terms as practiced by the Certifying Entity.

Recommendations - Allow the licensee with a good proven certification program to continue to certify their radiographic personnel.

- (2) Part 34.23 - Locking and relocation of radiographic exposure devices, storage containers and source changers. The proposed amendment includes in part requirement for radiographic exposure devices before being moved from one location to another, must have the guide tubes and control cables disconnected, safety plug or covers applied, locked and physically secured to prevent accidental loss, tampering or removal of licensed material, and must be surveyed to assure that the sealed source is in the shielded position.

Discussion - That statement "being moved from one location to another" is very vague and subject to misinterpretation. There are conditions when a radiographic device has to be moved a foot or more in a given location during radiographic operation. The proposal will make the operation very cumbersome and potentially enhance radiographic personnel to receive unnecessary dose of radiation.

Recommendations - Clarify the requirement regarding locking and relocation of the exposure device to state "that when a exposure device has to be moved from a radiation-controlled area to another location, the radiographer must have the guide tubes and control cables disconnected, safety plug, or covers applied, locked and physically secured to prevent accidental loss, tampering or removal of licensed material, and must be surveyed to assure that the sealed source is in the shielded position.

- (3) Part 34.33 - Permanent Radiographic Installations. The proposed amendment includes in part that the alarm system must be tested for proper operation at the beginning of each day the installation is used for radiographic operation. Then, continued to add that "entrance control devices must be tested monthly."

Discussion - Presently, it is a requirement to perform a test on the entrance control devices prior to the use of the facility. Additionally, it is a requirement to test it quarterly for proper operation. A monthly test will not enhance protection.

Recommendations - Do not amend the current requirements.

- (4) Part 34.41 - Conducting Radiographic Operations. The proposed amendment requires at least a 2-person crew when performing radiography outside of a permanent facility. It continues to state in part that "the additional qualified individual(s) shall observe the operations and be capable of providing immediate assistance to prevent unauthorized entry.

Discussion - The decision to add more crew should be made by the responsible radiographer. This individual is trained to make that determination. Additionally, the determination to whether the additional qualified individual(s) observe the operation or perform other tasks should be made by the radiographer as well. This approach is practical and realistic consideration in the industry.

Recommendations - Leave this decision to the responsible radiographer.

- (5) Part 34.42 - Radiation Safety Officer (RSO). The proposed amendments includes in part "2000 hours of documented experience in industrial radiographic operations, with at least 40 hours of formal classroom training with respect to the establishment and maintenance of a radiation protection program".

Discussion - The 2000 hours is unnecessary and may possibly make it difficult to assign an RSO in a timely manner if the need arises.

Recommendations - Delete or reduce the hours documented experience. The 2000-hour requirement may potentially disqualify other qualified radiation protection personnel such as, Nuclear Health Physicists for the position as RSO. Administrative skills and quality assurance related training would be more helpful to the RSO.

- (6) Part 34.47 - Personnel Monitoring. The proposed amendment states in part alarm ratemeter "Be adequate to alert the individual regardless of the environmental conditions (e. g., high ambient noises levels)."

Discussion - The additional equipment would be cumbersome to carry, considering all the working conditions that radiographic personnel has to encounter. The requirement may serve as a potential hazard during the preparation for the activity or actually while performing the work.

Recommendations - Delete the requirement. Emphasize the use of the survey meter.

- (7) Part 34.49 - Radiation Surveys. The proposed amendment states in part that "These surveys must be performed initially with radioactive material present in the storage location and thereafter at the time of the quarterly inventory and whenever storage conditions change (i.e.,

increases in radioactive material present or changes in shielding or arrangement of radioactive material."

Discussion - The survey requirement at the time of the quarterly inventory is not necessary considering that there is a current requirement to survey the radioactive material during transportation, prior to and during its use, and at the time of storage. The present system is adequate.

Recommendations - Delete the proposed amendment. The present system is adequate.

- (9) Part 34.71 - Utilization Logs. The proposed amendments includes in part "the identity and signature of the radiographer to whom assigned ---".

Discussion - The present requirements of controlling the Utilization Log is adequate and should be maintained. The proposed amendment to add the signature of the radiographer would not enhance the control of the radioactive material. Instead it will make it difficult for many licensee such as Consumers Power Company to comply. In our case the RSO controls the log. The radiographers notify the RSO prior to the use of the licensed material and its location. The RSO records the information in the utilization log. The distance between the RSO and field offices makes it impossible to obtain the signature of the field radiographers. The system works and enables the RSO to monitor the use of the licensed material.

Recommendations - Delete the requirement for the signature of the radiographer in the utilization log.

- (9) Part 34.83 - Records of Personnel Monitoring. The proposed amendments require in part that the license to maintain "Records of estimates of exposures as a result of off-scale pocket dosimeters -----."

Discussion - This requirement is unnecessary because in our case the TLD is required to be processed immediately upon discovery of an off scale pocket dosimeter to determine the dose received by the individual. The individual is not allowed to work in the radiation area until the results of the TLD reading are known. Therefore, there is no need to maintain records of estimated exposure as a result of off-scale pocket dosimeter. I would recommend, however that the proposal should read, "Records of estimates of exposures must be determined as a result of lost or damaged film badge or TLDs for the duration of the license."

Recommendations - Delete the requirement to maintain records of estimates of exposure as a result of off-scale pocket dosimeter. The proposal should read "Records of estimates of exposures must be determined as a result of lost or damaged film badge or TLDs for the duration of the license."

- (10) Part 34.89 - Documents and records required at Field Stations and Permanent Installations.

Discussion - The proposed amendment requires each licensee to maintain copies of many records and documents both at field stations and permanent installations. This would require voluminous records and some of which are confidential, such as the written and practical examinations that are part of the training and certification records. The licensee would be required to have additional resources to accommodate the need for the manpower and material to properly control these records. At Consumers Power Company, we control all the records at our permanent facility. It is working effectively. Therefore, the licensee should be able to make the final determination on where to control, maintain and keep records whether in the permanent facility, or both permanent facility and field station, and not be mandated by the Commission.

Recommendations - Each licensee should make a determination where to keep their records and not be mandated by the Commission.

- (11) Part 34.91 - Documents and records required at temporary jobsites and use or storage locations exceeding 180 days. The proposed amendment requires that the licensee conducting operations at a temporary jobsite maintain a set of documents at the jobsite until the job is completed and at any storage locations where radioactive material is stored for more than 180 days. This requirement includes in part "Latest survey records required".

Discussion - The proposed amendment is vague and confusing. Is this 180 days continuous radiographic operations or 180 days of continuous days of storage? What happens if the operations and/or storage is accomplished intermittently? Which latest survey records are considered acceptable by the NRC?

Recommendations - Clarify the intent of the regulations and be more specific in terms of the number of days - continuous or sum total of operational days and/or storage? Which latest survey record is considered acceptable.